

**BEFORE THE ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI**

**W. DALE FINKE, Director of** )  
**Insurance, State of Missouri,** )  
 )  
**Petitioner,** )  
 )  
**v.** )  
 )  
**DEMETRIUS GLASS &** )  
**VERSATILE MANAGEMENT** )  
**GROUP,** )  
 )  
**Respondents.** )

**Case No. 04-1128 DI**

**FILED**

**JUN 03 2005**

**ADMINISTRATIVE HEARING  
COMMISSION**

**PETITIONER'S REPLY BRIEF**

Petitioner replies to Respondents' Brief as follows:

The substantial and competent evidence set forth in Petitioner's Exhibits 1-8 establishes that Respondents have improperly withheld, misappropriated and converted money received in the course of doing insurance business, a ground for discipline under section 375.141.1(4), RSMo Supp. 2004.

The substantial and competent evidence set forth in Petitioner's Exhibits 1-8 establishes that Respondents have violated an insurance regulation (20 CSR 700-1.140(2)(D)), a ground for discipline under section 375.141.1(2), RSMo Supp. 2004.

The substantial and competent evidence set forth in Petitioner's Exhibits 1-8 establishes that Respondents have used dishonest practices and demonstrated incompetence, untrustworthiness and financial irresponsibility in the conduct of business in this state, a ground for discipline under section 375.141.1(8), RSMo Supp. 2004.

### CONCLUSION

The Director requests that this Commission:

- (1) Affirm the Director's refusal to add "Property and Casualty" as a line of insurance to Respondent Demetrius Glass' license.
- (2) Affirm the Director's refusal to renew Respondent Demetrius Glass' license.
- (3) Find cause to discipline Respondent Demetrius Glass' license.
- (4) Find cause to discipline Respondent Versatile Management Group's license.

Respectfully submitted,

W. Dale Finke, Director of Insurance  
State of Missouri

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### CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the foregoing was mailed first class, with sufficient postage attached, via the United States Postal Service on this 3<sup>rd</sup> day of June 2005 to:

Dorothy White-Coleman  
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